

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

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YEKUSIEL SEBROW, an individual; on behalf  
of himself and all others similarly situated,

Plaintiffs,

vs.

FULTON, FRIEDMAN, & GULLACE, LLP, a  
New York Limited Liability Partnership;  
THOMAS MCCARTHY, individually and in his  
official capacity; JASON P. VERHAGEN,  
individually and in his official capacity; MARIA  
J. REED, individually and in her official  
capacity; PATRICIA A. BLAIR, individually  
and in her official capacity; DANTE GULLACE,  
individually and in his official capacity;  
CYNTHIA L. FULTON, individually and in her  
official capacity; ALLAN J. FRIEDMAN,  
individually and in his official capacity; and  
JOHN AND JANE DOES NUMBERS 8  
THROUGH 25,

Defendants.

CASE NO.: 1:10-cv-05897-DLI-RER

**DECLARATION OF ABRAHAM  
KLEINMAN IN SUPPORT OF  
UNOPPOSED MOTION FOR FINAL  
APPROVAL OF CLASS SETTLEMENT  
AGREEMENT AND RELEASE**

I, Abraham Kleinman, of full age, hereby certify as follows:

1. I am an attorney duly admitted to practice law in the State of New York and the Bar of this Court. I am one of the Class Counsel in the above-entitled action [Doc. 70]. As such, I am familiar with all of the facts set forth herein and state them to be true. I submit this affidavit in support of Plaintiff’s Unopposed Motion for Final Approval of Class Settlement Agreement and Release.

2. I am the principal of Kleinman, LLC.

3. I am a graduate of the the Touro College Jacob D. Fuchsberg Law Center.

4. My professional career has concentrated in consumer litigation and consumer class actions.

5. I am a member of the New York State Bar Association, American Bar Association and the National Association of Consumer Advocates.

6. My litigation emphasis has been in the domain of the Truth in Lending Act, including the Federal Fair Debt Collection Practices Act and the Fair Credit Reporting Act.

7. I have been certified to act as class counsel in several class action lawsuits, and I was, by way of limited example, certified to act as sole class counsel in the matter of *John Duffy III v. Oliphant Financial LLC*, United States District Court, Eastern District of New York, 2:07-cv-03657-DRH-AKT.

8. To date, I have expended a total of 42.5 hours of total time. My normal hourly billing rate is \$350.00, which is in my opinion fair, reasonable, and consistent with the rates in the Eastern District of New York (where my practice is located) based on my knowledge and experience and in light of the risks inherent in bringing and prosecuting cases such as this one.

9. To date, I have received 17 requests from Settlement Class Members who requested exclusion from, and 2 objections to, the class settlement, all of which are attached as *Exhibit A* to the Affidavit of William F. Horn

*In accordance with 28 U.S.C. §1746, I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on this 3rd day of July 2013, at Uniondale, New York.*

s/ Abraham Kleinman

Abraham Kleinman, Esq. (AK-6300)

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